

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

ANGELA ZORICH,)
Plaintiff,)
v.) 4:17-cv-1522 PLC
ST. LOUIS COUNTY, et al.,)
Defendants.)

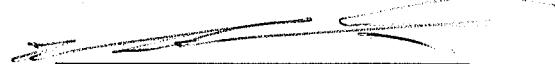
AFFIDAVIT OF MARCELLUS SPEIGHT

I, Marcellus Speight, being of lawful age do upon my oath state as follows:

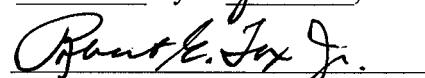
1. I am the Manager, Inspections for the Code Enforcement Division of the St. Louis County Department of Public Works, and have personal knowledge of all statements contained within this Affidavit.
2. As the Manager, Inspections for the Code Enforcement Division, I am familiar with the St. Louis County Building, Plumbing and Electrical Codes, health and safety issues associated with the codes, and with measures St. Louis County takes to enforce various provisions of the building, plumbing and electrical codes.
3. In April 2014, St. Louis County's Plumbing Code required gas utility service to all residences serviced by gas water heaters for health and safety reasons.
4. Hot water is required in all residences for hygienic and sanitary purposes.
5. When a gas water heater is the source of hot water to a residence, heating water by an alternative method is prohibited by the Plumbing Code because it poses a health hazard. The temperature of the water cannot be regulated, which in turn creates a risk of injury and insufficient sanitation.

6. Serious code violations such as disconnected utilities that are visible from the exterior of a residence raise reasonable suspicion of interior code violations.
7. The County requires an interior inspection of all occupied residences where gas service has been disconnected to determine whether other code issues have been compromised, including whether there is an operational water heater.
8. St. Louis County issues orders to vacate when a gas water heater is the source of hot water to an occupied residence and there is no gas service to the residence.

FURTHER THE AFFIANT SAITH NOT.


Marcellus Speight

Subscribed and sworn to me this 8th day of June, 2018.


Robert E. Fox Jr.

Notary Public

My commission expires: 4-15-2021

